

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

CATHERINE OKORO,

Plaintiff,

Civil Action No.: 2:11-CV-00267

v.

PYRAMID 4 AEGIS and
JEROME BATTLES,

Defendant.

PLAINTIFF'S ANSWER TO DEFENDANTS' COUNTERCLAIM

Plaintiff, Catherine Okoro, by and through her attorneys, Rebecca L. Salawdeh of Salawdeh Law Office, LLC and Marni Willenson of Willenson Law, LLC, for an Answer to the Counterclaim of the Defendants, Pyramid 4 Aegis and Jerome Battles, alleges and shows to the Court as follows:

1. Plaintiff's responses to paragraphs 1 through 33 are fully stated in her complaint.

Further, many of these paragraphs, including but not limited to the Affirmative Defenses, call for a legal conclusion, for which no response is necessary.

COUNTERCLAIM
Tortious Interference with Contract

2. Ms. Okoro admits that she ceased all activities at Pyramid 4 Aegis in May, 2010.

3. Ms. Okoro denies that she had any desire to damage Pyramid 4 Aegis. Ms. Okoro affirmatively states that she had an interest in the continued success of the business, as this would increase her chance of ultimately being paid the wages due to her.
4. Ms. Okoro denies that she interfered with any client contracts and at all times acted to encourage clients to use Defendants' facility.
5. Ms. Okoro denies that she interfered with any client contracts and at all times acted to encourage clients to use Defendants' facility and therefore did not receive any compensation for encouraging clients to leave.
6. Ms. Okoro denies that Defendants were damaged by Ms. Okoro and further states that any damage to Defendants was due to Defendants own poor management of the business.

AFFIRMATIVE DEFENSES

1. Defendants filed this counterclaim with the intention of retaliating against Ms. Okoro for bringing her complaint for unpaid wages.
2. Defendants filed this counterclaim without any evidentiary support, have made no effort to obtain any evidentiary support, and will not likely have evidentiary support after further investigation, in violation of Rule 11 of the Rules of Civil Procedure.
3. Defendants made this allegation with the improper purpose of harassing Ms. Okoro, causing unnecessary delay and to needlessly increase the cost of the litigation, in violation of Rule 11 of Rules of Civil Procedure.
4. Defendants failed to state a claim for which relief may be granted.

5. Defendants have failed to mitigate their damages.

Dated this 27th day of February, 2012.

RESPECTFULLY SUBMITTED:

s/Rebecca L. Salawdeh

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